

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
ROCK HILL DIVISION

UNITED STATES OF AMERICA ) CRIMINAL NO. 0:15cr188  
 ) 21 U.S.C. § 843(a)(3)  
 ) 21 U.S.C. § 843(d)(1)  
 ) 18 U.S.C. § 641  
v. )  
CHARLIE SIMS JR. ) INDICTMENT

COUNT 1

THE GRAND JURY CHARGES:

Beginning on or about November 4, 2008, and continuing through on or about October 1, 2013, in the District of South Carolina, the defendant, **CHARLIE SIMS JR.**, did knowingly, intentionally and unlawfully acquire and obtain possession of controlled substances by misrepresentation, fraud, forgery, deception and subterfuge, that is, the defendant, **CHARLIE SIMS JR.**, while under the care of physicians with the Department of Veterans Affairs, did engage in "doctor shopping" and thus did obtain multiple prescriptions for Oxycodone, a Schedule II controlled substance, by failing to mention or affirmatively denying to the prescribing physicians that he already had prescriptions for Oxycodone;

In violation of Title 21, United States Code, Sections 843(a)(3) and 843(d)(1).

COUNT 2

THE GRAND JURY FURTHER CHARGES:

Beginning on or about November 4, 2008, and continuing through on or about October 1, 2013, in the District of South Carolina, the defendant, **CHARLIE SIMS JR**, knowingly and willfully did embezzle, steal, purloin, and convert to his own use property belonging to the Department of Veterans Affairs, an agency of the United States, of a value less than \$1,000.00, said property having come into the possession of **CHARLIE SIMS JR** by way of him obtaining prescription pain killers from doctors and pharmacists working for the Department of Veterans Affairs, when **CHARLIE SIMS JR** knew that he had failed to notify the Department of Veterans Affairs that he was "doctor shopping" and thus obtaining prescription pain killers from private physicians during the same time period that he was under treatment by the Department of Veterans Affairs;

In violation of Title 18, United States Code, Section 641.

A TRUE BILL

Redacted

FOREPERSON

  
WILLIAM N. NETTLES (TDP)  
UNITED STATES ATTORNEY